



OCCH
OHIO CAPITAL
CORPORATION
FOR HOUSING

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May 16, 2013

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Mail Stop 9W-11
400 7th Street SW
Washington, DC 20219
Docket ID OCC-2013-0003
Regs.comments@occ.treas.gov

Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket No. OP-1456
Regs.comments@federalreserve.gov

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
comments@fdic.gov

Dear Sirs/Madams,

The Ohio Capital Corporation for Housing (OCCH) is a nonprofit corporation that has raised more than \$2.5 billion in corporate equity and has invested in over 600 housing developments, creating more than 30,000 units of affordable housing. OCCH works with non-profit organizations, public housing authorities, private developers, and city and state governments to cause the construction, rehabilitation and preservation of affordable housing throughout Ohio and Kentucky.

We strongly support the Interagency process and its goal of spurring more Community Development lending, investing, and services. We urge you to finalize the revisions as soon as practical with the ultimate goal of increasing the flow of capital to underserved communities by appropriately recognizing the value and impact of these activities within the CRA evaluations.

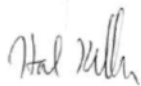
The revised Q&As clearly re-establish the longstanding, very valuable approach of the Agencies' ensuring that depository institutions receive full CRA credit for their investments in statewide and regional funds. We appreciate the recognition that lending and investing by pooled funds that both meet community needs and also diversify banks' risks takes time. The Agencies explicitly recognize that "at some point the institution's assessment area[s] may receive some benefit."

OCCH works with banks and other financial institutions to create a multi-investor fund each year. The use of a multi-investor pool allows us to serve rural areas, special needs populations, and deals that otherwise might be passed over because of a perception of greater risk in comparison to more mainstream properties. Additionally, multi-investor regional funds allow even smaller banks to

participate and increase the flow of equity to underserved markets, and it allows them to participate in a manner that shares and minimizes risk.

Finally, we would like to recognize and support the work that the National Association of Affordable Housing Lenders has done to provide detailed commentary on the "Interagency Questions and Answers Regarding Community Reinvestment." I urge you to finalize the revisions quickly and in a manner that continues to increase the flow of capital to underserved communities.

Sincerely,

A handwritten signature in dark ink, appearing to read "Hal Keller". The signature is written in a cursive, flowing style.

Hal Keller
President